UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF VIRGINIA Alexandria Division

UNITED STATES OF AMERICA, ex rel. PAUL FRASCELLA,

Plaintiff,

v.

CASE NO. 1:07cv529 (LMB/TRJ)

ORACLE CORP., et al.

Defendants.

NOTICE OF STIPULATION OF THE PARTIES RELATING TO REMOTE ACCESS AND REQUEST FOR THE COURT TO ENTER PROPOSED ORDER

The parties to the suit -- Oracle Corp. and Oracle America Inc. (collectively, "Oracle"), the United States Government, and the Relator -- have agreed that in response to a request, the United States Government and the Relator will be provided with remote read-only access to the Order Management ("OM"), eZorder, pricing agreements and the AR transaction form within Oracle's Global Single Instance ("GSI") database for the purpose of reviewing U.S. orders placed between 1998 and 2006. The parties believe this agreement will expedite some of the key discovery issues in this case. In order to effectuate this agreement, the parties believe that an Order from this Court is necessary. Accordingly, the parties respectfully request that the Court enter the attached Proposed Stipulation and Order Relating To Remote Access.

Respectfully submitted,

/s/

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CERTIFICATE OF SERVICE

I hereby certify that on the 27th day of April, 2011, I electronically filed the foregoing with the Clerk using the CM/ECF system, which will then send a notification of such filing (NEF) to the following:

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